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GILDEN & RAVENELL, P. A. U.S. DISTRICT COURT
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November 27, 2001

* ALSO ADMITTED IN CO
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The Honorable Catherine C. Blake
United States District Court for the
District of Maryland
Garmatz Federal Courthouse
101 West Lombard Street
Baltimore, Maryland 21201

REC

OF

UNI JUDGE

Re: Cason v. Maryland Division of Correction
Civil Action CCB-00-2115

Dear Judge Blake:

Pursuant to the Court's Order of September 21, 2001, Plaintiff Marc S. Cason ("Cason") provides the following information as a Status Report.

- A. The Plaintiff is filing today a Second Amended Complaint, adding two correctional guards and the Plaintiff's case worker as defendants. The Plaintiff may need to add additional defendants after Defendants provide their discovery responses.
- B. The Plaintiff will file his First Set of Interrogatories to each defendant and First Set of Request for Production of Documents to each defendant no later than November 30, 2001.
- C. Counsel for the Plaintiff has traveled to Cumberland and met with the Plaintiff to discuss the substance and facts of his claim.
- D. Undersigned counsel has conferred with Assistant Attorney General Stephanie Lane-Weber. Ms. Weber has agreed to accept service for the newly named defendants provided that they are still employed by the Division of Correction. She has also agreed to promptly notify counsel for Plaintiff if the newly named defendants are not so employed, subpoenas will be promptly issued and served.

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E. Counsel have agreed upon a tentative discovery schedule, subject to approval by the Court. Counsel would respectfully request that the discovery deadline date be April 30, 2002, and that the time for filing dispositive motions be set for June 15, 2002. | ✓

Thank you for your cooperation.

Very truly yours,



Leslie D. Hershfield

LDH:bl

cc: Stephanie Lane-Weber, Esquire
Marc S. Cason

Approved.
Status Report due April 30, 2002.
Cath Blake
11/21/01